

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
LAFAYETTE DIVISION**

THE STATE OF ARIZONA, et al.,

PLAINTIFFS,

v.

MERRICK GARLAND in his official capacity
as Attorney General of the United States of
America; et al.,

DEFENDANTS.

CIVIL ACTION NO. 6:22-cv-01130

PUBLIC DECLARATION OF ATTORNEY JOSEPH SCOTT ST. JOHN

I, Joseph Scott St. John, declare as follows:

1. I am a Deputy Solicitor General at the Louisiana Department of Justice. I am counsel for the State of Louisiana in the above-captioned litigation. I am over the age of 18, and I have personal knowledge of the facts contained in this Declaration.
2. Attached hereto as Exhibit 2 is a true and accurate copy of the deposition transcript of Prof. Clemens, as received from the court reporter.
3. Attached hereto as Exhibit 3 is a true and accurate copy of Prof. Clemens's deposition errata sheet, as received from opposing counsel.
4. Attached hereto as Exhibit 5 is a true and accurate copy of Clemens Dep. Exh. 5.
5. Attached hereto as Exhibit 6 is a true and accurate copy of Clemens. Dep. Exh. 6.
6. Attached hereto as Exhibit 219 is a true and accurate copy of a judgment, as downloaded from Westlaw.
7. Attached hereto as Exhibit 250 is a true and accurate copy of the deposition transcript of former Border Patrol Chief Rodney Scott, as received from the court reporter.

8. Attached hereto as Exhibit 251 is a true and accurate copy of former Border Patrol Chief Rodney Scott's deposition errata sheet, as received from Chief Scott's counsel.

9. Attached hereto as Exhibit 252 is a true and accurate copy of Scott Dep. Exhibit A, as received from the court reporter.

10. Attached hereto as Exhibit 253 is a true and accurate copy of Scott Dep. Exhibit B, as received from the court reporter.

11. Attached hereto as Exhibit 254 is a true and accurate copy of Scott Dep. Exhibit C, as received from the court reporter.

12. Attached hereto as Exhibit 255 is a true and accurate copy of Scott Dep. Exhibit D, as received from the court reporter.

13. Attached hereto as Exhibit 256 is a true and accurate copy of the deposition transcript of Andrew "Art" Arthur, as 30(b)(6), as received from the court reporter.

14. Attached hereto as Exhibit 257 is a true and accurate copy of the deposition transcript of Andrew "Art" Arthur, as a retained expert, as received from the court reporter.

15. Attached as Exhibits 260 – 269 are true and accurate copies of documents Defendants produced in discovery.

16. Attached as Exhibit 270 is a true and accurate copy of excerpts from the attachment to Defendants' Notice of Exhibits Admitted at November 27, 2023 Hearing, filed by Department of Homeland Security et al. in *State of Texas v. U.S. Department of Homeland Security et al*, No. 2:23-cv-55 (W.D. Tex.), as obtained from Westlaw.

17. Attached as Exhibit 271 is a true and accurate copy of a press report.

18. A true and accurate copy of an Agreement between the Louisiana Department of Justice and, *inter alia*, the U.S. Department of Justice ("Agreement" or "MOU"), as obtained from the files of the Louisiana Department of Justice, was previously filed at ECF 2-2 and ECF 86-2.

19. Further declarant sayeth naught.

I DECLARE UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE UNITED STATES OF AMERICA AND THE STATE OF LOUISIANA THAT THE FOREGOING IS TRUE AND CORRECT.

Executed in New Orleans, Louisiana, this 29th day of January 2024.

/s/ Joseph Scott St. John